

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

	)	
<b>In re:</b>	)	Chapter 7
	)	
<b>MLCJR LLC, <i>et al.</i>,<sup>1</sup></b>	)	Case No. 23-90324 (CML)
	)	
<b>Debtors.</b>	)	Jointly Administered
	)	
	)	

**PURCHASER'S WITNESS AND  
EXHIBIT LIST FOR MARCH 6, 2025 HEARING**

W&T Offshore, Inc. (the “Purchaser”) files this witness and exhibit list for the hybrid hearing to be held on **March 6, 2025 at 11:00 a.m. (prevailing Central Time)** before the Honorable Christopher M. Lopez in Courtroom 401, 515 Rusk, Houston, TX 77002 (the “Hearing”) for consideration of the *Trustee’s Emergency Motion for the Entry of an Order (I) Approving the Trustee’s Entry into the Purchase Agreement, (II) Authorizing the Sale of Estate Property Free and Clear of All Liens, Claims, Interests, and Encumbrances, (III) Authorizing the Assumption and Assignment of Executory Contracts, and (IV) Granting Related Relief [Docket No. 2383]*<sup>2</sup> (the “Sale Motion”).<sup>3</sup>

**WITNESSES**

The Purchaser may, and reserves the right to, call any of the following witnesses at the Hearing:

<sup>1</sup> The debtors in these cases (collectively, the “Debtors”), along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

<sup>2</sup> Unless otherwise specified, Docket Nos. refer to Case No. 23-90324.

<sup>3</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Sale Motion.

1. Any witness designated or called by any other party;
2. Any witness necessary to rebut any evidence or testimony;
3. Any witness necessary to authenticate any document; and
4. Any witness needed for impeachment.

### **EXHIBITS**

<b>Ex. #</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>	<b>Date</b>
1.	Any pleadings, reports, exhibits, transcripts, proposed orders, Court orders, or other documents filed in the above-captioned bankruptcy cases				
2.	Any exhibit introduced by any other party				
3.	Rebuttal or impeachment exhibits as necessary				

### **RESERVATION OF RIGHTS**

The Purchaser reserves the right to call any witness identified by any other party. The Purchaser also reserves the right to identify and call additional witnesses, including expert witnesses for the purpose of addressing, rebutting, responding, or replying to any facts, allegations, issues, and/or arguments raised by any party during or prior to the Hearing, including any party opposing approval of the Sale Motion. Additionally, the Purchaser reserves the right to call additional rebuttal witnesses based on the identification or testimony of any witness of any other party.

The Purchaser reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Purchaser also reserves the right to introduce exhibits previously admitted. Additionally, the Purchaser reserves the right to identify and submit additional evidence for the purpose of addressing, rebutting, responding, or replying

to any facts, allegations, issues, and/or arguments raised by any party during or prior to the Hearing, including any party opposing approval of the Sale Motion.

The Purchaser expressly reserves any and all rights to supplement, amend, or otherwise revise the foregoing *Purchaser's Witness and Exhibit List for March 6, 2025 Hearing*.

Date: March 5, 2025  
Houston, Texas

**GIBSON, DUNN & CRUTCHER LLP**

/s/ Gregg J. Costa  
Gregg J. Costa (TX 24028160)  
*Admitted to the Southern District of Texas*  
*(SDTX Federal No. 32779)*  
**GIBSON, DUNN & CRUTCHER LLP**  
811 Main Street Suite 3000  
Houston, TX 77002-6117  
Telephone: (346) 718-6600  
Email: GCosta@gibsondunn.com

- and -

Christina Brown (admitted *pro hac vice*)  
**GIBSON, DUNN & CRUTCHER LLP**  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: (212) 351-4000  
Email: Christina.Brown@gibsondunn.com

- and -

Suzanne E. Span (admitted *pro hac vice*)  
**GIBSON, DUNN & CRUTCHER LLP**  
3161 Michelson Drive, Suite 1200  
Irvine, CA 92612-4412  
Telephone: (949) 451-3800  
Facsimile: (949) 451-4220  
Email: SSpan@gibsondunn.com

***Attorneys for the W&T Offshore, Inc., W&T Energy VI  
and their affiliates and subsidiaries***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing pleading was caused to be served upon all parties that are registered to receive electronic service through the court's ECF notice system in the above case on this 5th day of March 2025.

/s/ Gregg J. Costa  
Gregg J. Costa